CRODA

**Croda Inc**
300 A Columbus Circle
Edison NJ 08837
USA
Tel +1 (732) 417 0800
Fax +1 (732) 417 0804

TSCA Confidential Business Information Center
EPA East – Room 6428 Attn. Section 8e
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001
Phone: (202) 564-8940

**25** June 2014

**Subject: TSCA 8(e) Notice**
**Amines, C13-15-alkyl, ethoxylated CAS # 70955-14-5**

In accordance with Section 8(e) of the Toxic Substances Control Act, Croda Inc. is submitting the following information.

As part of the testing program to support REACH registration in Europe, a final audited report was received on May 27, 2014 for an OECD 211 *Daphnia magna* reproduction test on CAS # 70955-14-5 (CAS # 97925-95-6 in Europe). The study was conducted by Harlan Laboratories Ltd in Switzerland and was sponsored by Croda Europe Ltd.

The effect of the test item on the survival and reproduction of *Daphnia magna* was investigated in a semi-static test over 21 days following the OECD Guidelines for Testing of Chemicals, No. 211 (2008): "*Daphnia magna* Reproduction Test" and the Commission Regulation (EC) No 440/2008, C.20: "*Daphnia magn*a Reproduction Test". The nominal concentrations tested were 0.0050, 0.016, 0.050, 0.16 and 0.50 mg/L. Additionally, a control was tested in parallel.

Under the conditions of the test, the test item was not stable during the test medium renewal periods of two and three days. Therefore, all reported biological results are related to the mean measured concentrations of the test item. The results are summarized in the table below.

| | | Test item nominal concentration (mean measured concentration in brackets), mg/L | | | | |
|---|---|---|---|---|---|---|
| | Control | 0.0050 (n.a.) | 0.016 (n.a.) | 0.050 (n.a.) | 0.16 (0.10) | 0.50 (0.32) |
| Mortality (%) after 21 days of exposure | 0 | 10 | 0 | 0 | 0 | 100 |
| Mean reproduction rate (living offspring per surviving adult) | 133.8 | 118.9# | 123.1 | 121.8# | 148.2 | 0* |
| Mean reproduction rate in % of control | 100.0 | 88.9 | 92.0 | 91.0 | 110.8 | 0* |

n.a. not analyzed since below NOEC of the study
* all adult test animals died over the test duration
# statistically significantly lower than the control value, results of a Dunnett t-test, one-sided smaller, α=0.05 due to very low variability of results, however, not estimated as biologically relevant toxic effect, since no concentration-response relationship could be observed

In conclusion, taking into account the effects of the test item on survival and reproduction of the test animals, the 21-day NOEC was 0.10 mg/L. The 21-day LOEC was 0.32 mg/L, due to the high mortality rate of *Daphnia magna* at this mean measured test concentration. No EC values for the inhibition of the reproduction rate could be calculated since no effect was determined on the reproduction of the daphnids up to and including the mean measured concentration of 0.10 mg/L. At the highest concentration tested (mean measured 0.32 mg/L), no offspring were produced due to the mortality of the parent daphnids.

Croda Inc. has determined that none of the information contained in this notice constitutes confidential business information (CBI) under TSCA.

If you have additional questions, you may contact me at (732) 417-0800.

Sincerely,

Duane St. Amour

Duane St. Amour
Product Safety Advisor
Croda Inc.
300A Columbus Circle
Edison, NJ 08837-3907
Phone: (732) 417-0800 ext 24238